

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
GRIFFIN CAMPBELL	:	VIOLATIONS:
	:	21 U.S.C. § 841(a)(1) (distribution of
	:	cocaine base - 2 counts)
	:	21 U.S.C. § 860 (distribution of cocaine
	:	base within 1,000 feet of a playground - 1
	:	count)
	:	21 U.S.C. § 853 (notice of forfeiture)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about July 12, 2000, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

GRIFFIN CAMPBELL

knowingly and intentionally distributed more than 50 grams, that is, approximately 56 grams, of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 12, 2000, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

GRIFFIN CAMPBELL

knowingly and intentionally distributed more than 50 grams, that is, approximately 56 grams, of a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising Happy Hollow Playground, located at 4900 Wayne Avenue, Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A).

In violation of Title 21, United States Code, Section 860(a).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 12, 2001, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

GRIFFIN CAMPBELL

knowingly and intentionally distributed more than 50 grams, that is, approximately 54.6 grams, of
a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II
controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 21, United States Code, Sections 841(a)(1) and 860(a), set forth in this indictment, defendant

GRIFFIN CAMPBELL

shall forfeit to the United States of America:

(a) any property constituting, or derived from, proceeds obtained directly or indirectly from the commission of such offenses, including, but not limited to, the sum of \$3,800.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 21, United States Code, Section 853.

A TRUE BILL:

GRAND JURY FOREPERSON

PATRICK L. MEEHAN
UNITED STATES ATTORNEY